

**EXHIBIT “A”**

SCHWARTZ GOLDSTONE & CAMPISI, LLP  
Attorneys for Plaintiff  
NJ Attorney ID Number: 171252015  
90 Broad Street, Suite 403  
New York, New York 10004  
212-962-2800

-----X  
BELA LOWY,

Plaintiff,

-against-

LONNIE JOHNSON AND TRUCKING BY FAITH, LLC

Defendants.  
-----X

SUPERIOR COURT OF  
NEW JERSEY  
LAW DIVISION-  
UNIOIN COUNTY

Docket Number: \_\_\_\_\_

**CIVIL ACTION  
SUMMONS**

From The State of New Jersey to the Defendants Named Above:

The Plaintiff named above has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis of this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deputyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf). If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer to motion to Plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment. If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deputyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf).

Dated: October 25, 2021

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Clerk of the Superior Court

DEFENDANTS' ADDRESSES:

LONNIE JOHNSON  
4380 Charter Point Boulevard  
Jacksonville, Florida 32277

TRUCKING BY FAITH LLC  
2219 Bridier Street  
Jacksonville, Florida 33227

SCHWARTZ GOLDSTONE & CAMPISI, LLP  
Attorneys for Plaintiff  
NJ Attorney ID Number: 171252015  
90 Broad Street, Suite 403  
New York, New York 10004  
212-962-2800

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BELA LOWY,

Plaintiff,

-against-

LONNIE JOHNSON AND TRUCKING BY FAITH LLC,

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SUPERIOR COURT OF  
NEW JERSEY  
LAW DIVISION-  
UNION COUNTY

Docket Number: \_\_\_\_\_

**CIVIL ACTION  
COMPLAINT, JURY  
DEMAND AND  
DESIGNATION OF TRIAL  
COUNSEL**

Plaintiff, **BELA LOWY**, by way of Complaint against the Defendants, **LONNIE JOHNSON and TRUCKING BY FAITH LLC**, hereby alleges and state:

**FIRST COUNT**

1. At all times relevant to the matters set forth herein, Plaintiff **BELA LOWY** resides at 715 Harris Avenue, Staten Island, New York 10314.

2. At all times relevant to the matters set forth herein, Defendant **LONNIE JOHNSON** resides at 4380 Charter Point Boulevard Jacksonville, Florida 32277.

3. At all times herein mentioned, Defendant, **TRUCKING BY FAITH, LLC**, was and still is a corporation.

4. At all times herein mentioned Defendant, **TRUCKING BY FAITH LLC**, was and still is a domestic for-profit corporation duly organized under the law of the State of Florida.

5. At all times herein mentioned Defendant, **TRUCKING BY FAITH LLC**, was and still is a for-profit corporation duly authorization to do business in the State of New Jersey.

6. That on or about April 26, 2021, and at all times herein mentioned, Defendant

**LONNIE JOHNSON** operated a 2016 box truck bearing Florida license plate number CIDH51.

7. That on or about April 26, 2021, and at all times herein mentioned, Defendant **TRUCKING BY FAITH LLC** owned the aforementioned motor vehicle.

8. That on or about April 26, 2021, and at all times herein mentioned, Defendant **TRUCKING BY FAITH, LLC** controlled the aforementioned motor vehicle.

9. That on or about April 26, 2021, and at all times herein mentioned, Defendant **LONNIE JOHNSON** controlled the aforementioned motor vehicle.

10. That on or about April 26, 2021, and at all times herein mentioned, Defendant **TRUCKING BY FAITH LLC** maintained the aforementioned motor vehicle.

11. That on or about April 26, 2021, and at all times herein mentioned, Defendant **LONNIE JOHNSON** maintained the aforementioned motor vehicle.

12. That on or about April 26, 2021, and at all times herein mentioned, Defendant **TRUCKING BY FAITH LLC** repaired the aforementioned motor vehicle.

13. That on or about April 26, 2021, and at all times herein mentioned, Defendant **LONNIE JOHNSON** repaired the aforementioned motor vehicle

14. That on or about April 26, 2021, and at all times herein mentioned, Defendant **LONNIE JOHNSON** operated the aforementioned motor vehicle with the permission and consent of its owner.

15. That on or about April 26, 2021, and at all times herein mentioned, Defendant **LONNIE JOHNSON** operated the aforementioned motor vehicle in the course and scope of his employment with **TRUCKING BY FAITH LLC**.

16. That on or about April 26, 2021, and at all times herein mentioned, US Route 1 at its intersection with S Park Avenue, in the County of Union, State of New Jersey, was a public roadway and/or thoroughfare for the use of motor vehicles, was and remain a much-traveled public highway

in common use by the citizens of the State of New Jersey and others.

17. That on or about April 26, 2021, and at all times herein mentioned, Defendant **LONNIE JOHNSON** was operating the aforementioned motor vehicles at or near the aforesaid location.

18. That on or about April 26, 2021, and at all times herein mentioned, Plaintiff **BELA LOWY** was lawfully operating a 2004 motor vehicle bearing New York State license plate number DBH9079 at or near the aforesaid location.

19. At the aforesaid date and location, Defendants' motor vehicles came into contact and/or collision with the motor vehicle operated by Plaintiff, BELA LOWY.

20. That on or about April 26, 2021, Defendants operated their motor vehicles in complete disregard of others and was otherwise careless and inattentive in that they failed to maintain a proper lookout; they failed to make reasonable observations; they failed to obey failed lane markers and center line demarcation; they were traveling at an excessive rate of speed; they were inattentive; they were traveling too close; they failed to keep safe distance between motor vehicles; they failed to failed to make use of a horn or warning mechanism; they failed to maintain control of their vehicle; they failed to bring their vehicle to a stop before striking another vehicle; failed to bring their vehicle to a stop before striking the Plaintiff's vehicle; and were otherwise negligent, reckless and careless, in failing to take those reasonable and safe precautions to avoid the occurrence and causing their vehicle to collide with the Plaintiff's vehicle.

21. As a direct and proximate result of Defendants' carelessness and negligence, Plaintiff was caused to sustain severe, painful, and permanent injuries to his body, which injuries necessitated medical treatment; he was compelled and shall in the future be compelled to expend large sums of money for medical care and attention, as well as endure great physical and

emotional pain and suffering; he is prevented from pursuing and enjoying his usual activities; attending to his chores; from assuming employment and his earnings power has been materially and adversely affected; and was otherwise damaged.

**WHEREFORE**, Plaintiff demands Judgment against the Defendants, for damages together with interest, cost of suit, attorneys' fee and such other relief as the Court may deem equitable and just.

**SECOND COUNT**

25. Plaintiff repeats, reiterates and realleges each and every allegation contained in the First Count and incorporates same herein as if set forth at length.

26. The acts and omissions of Defendants constitute a statutory tort, including, but not limited to, a violation of N.J.S.A., 39:4-105, 39: 4-90, 39:4-97, 39:3-44, 39:4-81, 39:4-98, 39:4-144, 39:4-215, 39:8-1, 39:8-4.

27. Defendants' violation of the statutory imposed duty constituted negligence and/or evidence of negligence.

**WHEREFORE**, Plaintiff demands Judgment against Defendants for damages together with interest, cost of suit, attorney's fee, and such other relief, as the Court may deem equitable and just.

**JURY DEMAND**

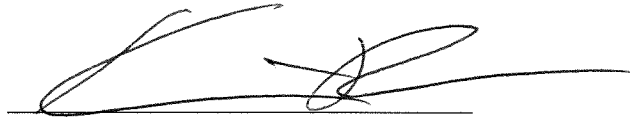
Plaintiff hereby demands a trial by jury on all of the triable issues of this Complaint, pursuant to Rule 1:8-2(b) and Rule 4:35-1(a).

  
KEVIN J. RYAN, ESQ.

Dated: October 25, 2021

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, KEVIN J. RYAN, ESQ., is hereby designated as trial counsel for the plaintiffs in the above matter.

  
\_\_\_\_\_  
KEVIN J. RYAN, ESQ.

Dated: October 25, 2021

**CERTIFICATION OF NON-PENDENCY**

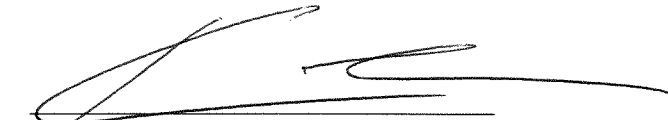
Pursuant to Rule 4:5-1, I hereby certify that to the best of my knowledge, the above captioned matter is not the subject of any other pending action in any Court or of a pending arbitration proceeding. I hereby certify that no other action or arbitration is being contemplated by plaintiff. Other than the parties set forth in this pleading, I know no other parties that should be joined in the above action.

  
\_\_\_\_\_  
KEVIN J. RYAN, ESQ.

Dated: October 25, 2021

**DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES**

The Plaintiff hereby demands of Defendant certified answers to Uniform Interrogatories Form C and C(1) within the time prescribed by the Rules of this Court.

  
\_\_\_\_\_  
KEVIN J. RYAN, ESQ.

Dated: October 25, 2021



## Civil Case Information Statement

### Case Details: UNION | Civil Part Docket# L-003754-21

**Case Caption:** LOWY BELA VS JOHNSON LONNIE  
**Case Initiation Date:** 11/01/2021  
**Attorney Name:** HERBERT RODRIGUEZ JR  
**Firm Name:** SCHWARTZ GOLDSTONE CAMPISI LLP  
**Address:** 90 BROAD ST SUITE 403  
NEW YORK NY 10004  
**Phone:** 2129622800  
**Name of Party:** PLAINTIFF : Lowy, Bela  
**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-  
VERBAL THRESHOLD)  
**Document Type:** Complaint with Jury Demand  
**Jury Demand:** YES - 12 JURORS  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same  
transaction or occurrence)?** NO  
  
**Are sexual abuse claims alleged by: Bela Lowy?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual  
management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/01/2021  
Dated

/s/ HERBERT RODRIGUEZ JR  
Signed